

From: [Armstrong, Scott \(CRM\)](#)
To: [Kim, Elise \(CRM\)](#)
Cc: [Liolos, John \(CRM\)](#)
Subject: FW: [EXTERNAL EMAIL] - New Package Is Waiting
Date: Monday, June 5, 2023 10:34:48 PM

From: Armstrong, Scott (CRM)
Sent: Thursday, October 6, 2022 9:09 AM
To: Jeremy Hale <jshale@fbi.gov>
Subject: RE: [EXTERNAL EMAIL] - New Package Is Waiting

thanks

From: Jeremy Hale <jshale@fbi.gov>
Sent: Thursday, October 6, 2022 8:02 AM
To: Armstrong, Scott (CRM) <Scott.Armstrong@usdoj.gov>
Subject: Fwd: [EXTERNAL EMAIL] - New Package Is Waiting

I'll put it to the case file too but here it is.

From: Beardsley, Allie <Allie.Beardsley@Schwab.com>
Sent: Thursday, October 6, 2022 6:54:28 AM
To: Hale, Jeremy S. (HO) (FBI) <jshale@fbi.gov>
Cc: TPLP Subpoena - TDA <TPLPSubpoena-TDA@schwab.com>
Subject: RE: [EXTERNAL EMAIL] - New Package Is Waiting

Good Morning,

Trade reports are all in Central Time Zone.

Thanks, A

Allie Beardsley

Manager | Legal Services

Tel 402 574 6899 | Fax 402 970 8420
200 S. 108th Ave, Omaha, NE 68154

Charles Schwab & Co., Inc.

NOTICE: All email sent to or from the Charles Schwab corporate email system is subject to archiving, monitoring and/or review by Schwab personnel.

TD Ameritrade Holding Corporation was acquired by The Charles Schwab Corporation on October 6, 2020. As such, correspondence regarding TD Ameritrade Holding Corporation matters may be addressed by The Charles Schwab Corporation.

From: Jeremy Hale <jshale@fbi.gov>
Sent: Wednesday, October 5, 2022 2:56 PM
To: Z\$Legal Process <zlegalprocess@tdameritrade.com>
Subject: Re: [EXTERNAL EMAIL] - New Package Is Waiting

Hello,

For the below referenced subpoena production, can you please tell me what the time zone for the trade reports.

Thank you,

SA Jeremy Hale

FBI Houston

Desk: 713-936-8773

Cell: 713-202-6384

From: Beardsley, Allie <Allie.Beardsley@Schwab.com>
Sent: Friday, July 29, 2022 12:22 PM
To: Hale, Jeremy S. (HO) (FBI) <jshale@fbi.gov>
Cc: Z\$Legal Process <zlegalprocess@tdameritrade.com>
Subject: RE: [EXTERNAL EMAIL] - New Package Is Waiting

Hello,

I will be sending the documents requested for the above-named case shortly. Please follow the instructions on the next e-mail with the subject "New Package Is Waiting". This e-mail will contain a link to our secure e-mail site.

If you do not receive an e-mail with a username and password: Use your e-mail address as the username and click on "Request a password change" link. You should then receive a follow up e-mail with password information.

Please note, the documents will only be available for 21 days on this website. To avoid further delay, download the records as soon as possible.

If you have any questions, please feel free to reach out.

Thank you,

Allie Beardsley

Manager | Legal Services

Tel 402 574 6899 | Fax 402 970 8420
200 S. 108th Ave, Omaha, NE 68154

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From: Beardsley, Allie

Sent: Tuesday, July 26, 2022 12:19 PM

To: Jeremy Hale <jshale@fbi.gov>

Cc: Z\$Legal Process <zlegalprocess@tdameritrade.com>

Subject: RE: [EXTERNAL EMAIL] - New Package Is Waiting

I want to assure you that we are not intentionally withholding any information or trying to hinder your case. Unfortunately, my team does not have access to a lot of what you're asking for. For our initial productions, we send you what we do easily have access to. Right now we're waiting on other departments to help fulfill the rest of the items you're missing. We'd be happy to send you a rolling production as those items are sent to us.

Thanks, A

Allie Beardsley

Manager | Legal Services

Tel 402 574 6899 | Fax 402 970 8420
200 S. 108th Ave, Omaha, NE 68154

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From: Jeremy Hale <jshale@fbi.gov>

Sent: Tuesday, July 26, 2022 11:46 AM

To: Beardsley, Allie <Allie.Beardsley@Schwab.com>

Cc: Z\$Legal Process <zlegalprocess@tdameritrade.com>

Subject: Re: [EXTERNAL EMAIL] - New Package Is Waiting

Ms. Beardsley,

Let me clarify, you're saying it is TD Ameritrade's process to intentionally withhold records requested by a federal grand jury subpoena. So you know you had these records and you intentionally chose not to provide them?

Thank you,

SA Jeremy Hale

FBI Houston

Desk: 713-936-8773

Cell: 713-202-6384

From: Beardsley, Allie <Allie.Beardsley@Schwab.com>

Sent: Tuesday, July 26, 2022 11:42 AM

To: Hale, Jeremy S. (HO) (FBI) <jshale@fbi.gov>; Liolos, John (CRM) <John.Liolos@usdoj.gov>

Cc: Z\$Legal Process <ZLegalProcess@tdameritrade.com>

Subject: RE: [EXTERNAL EMAIL] - New Package Is Waiting

Good Morning,

We have received your request for additional records. Please note that is our process that with an initial production we will only provide applications, statements, and any account modification forms.

I apologize for the delay, I was out of the office for an extended amount of time this month and am working to catch up. We are working diligently with multiple other departments to gather the records requested in your follow up. It is our plan to have the requested records to you by Friday, 7/29/22.

Thanks, A

Allie Beardsley

Manager | Legal Services

Tel 402 574 6899 | Fax 402 970 8420

200 S. 108th Ave, Omaha, NE 68154

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From: Z\$Legal Process <ZLegalProcess@schwab.com>
Sent: Tuesday, July 26, 2022 10:19 AM
To: Beardsley, Allie <Allie.Beardsley@Schwab.com>
Cc: Z\$Legal Process <ZLegalProcess@tdameritrade.com>; Z\$Legal Process <ZLegalProcess@schwab.com>
Subject: FW: [EXTERNAL EMAIL] - New Package Is Waiting
Importance: High

Looking for status update your ec138097, Constantinescu

Dana Brown

Specialist | Legal Services

Tel 402-970-7985 | Fax 402-970-8420
200 South 108th Avenue, Omaha, NE 68154

Charles Schwab & Co., Inc.

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From: Liolos, John (CRM) <John.Liolos@usdoj.gov>
Sent: Tuesday, July 26, 2022 9:11 AM
To: zlegalprocess@tdameritrade.com
Cc: Hale, Jeremy S. (HO) (FBI) <jshale@fbi.gov>
Subject: RE: [EXTERNAL EMAIL] - New Package Is Waiting

Hello,

Please immediately provide an update on the status of this subpoena response.

As SA Hale explained, the response to this subpoena was grossly inadequate and long overdue. It is now further overdue, as is a response to SA Hale's Friday email. TD Ameritrade's failure to adequately response is hindering our investigation and we expect a status update today.

Sincerely,

John J. Liolos

Trial Attorney
Criminal Division, Fraud Section
U.S. Department of Justice
1400 New York Avenue NW
Washington, DC 20530
202-768-2246

From: Jeremy Hale <jshale@fbi.gov>
Sent: Friday, July 22, 2022 5:05 PM
To: zlegalprocess@tdameritrade.com
Cc: Liolos, John (CRM) <John.Liolos@usdoj.gov>
Subject: Fw: [EXTERNAL EMAIL] - New Package Is Waiting

To whom it may concern,

Please see my below e-mail to Ms. Beardsley that has gone unanswered. TDAmeritrade's response to this subpoena was grossly inadequate and significantly over due at this point. I need a complete response to this immediately.

Thank you,

SA Jeremy Hale

FBI Houston

Desk: 713-936-8773

Cell: 713-202-6384

From: Hale, Jeremy S. (HO) (FBI) <jshale@fbi.gov>
Sent: Friday, July 15, 2022 6:27 PM
To: Beardsley, Alison M <Alison.Beardsley@tdameritrade.com>
Subject: Re: [EXTERNAL EMAIL] - New Package Is Waiting

Ms. Beardsley,

Many of the requested items on the subpoena were not provided. Only statements and account opening was provided. We need ALL items requested on the subpoena to the the extent TDAmeritrade has the records. Missing items of note were trade blotters, records of transfers to and from accounts (i.e. wire transfers ACH etc.), IP address logs, etc. Please review the subpoena again and provide a complete production of records. It is holding up our investigation to have to come back to you to request these records again. Provide them

immediately.

Thank you,

SA Jeremy Hale

FBI Houston

Desk: 713-936-8773

Cell: 713-202-6384

From: Beardsley, Alison M <Alison.Beardsley@tdameritrade.com>

Sent: Wednesday, July 6, 2022 2:07 PM

To: Hale, Jeremy S. (HO) (FBI) <jshale@fbi.gov>

Subject: [EXTERNAL EMAIL] - New Package Is Waiting

New Package Notification

Welcome to TDAmeritrade! A new package has been posted for you.

Subject: TDA Subpoena Production - GJS re Constantinescu

You will be required to supply credentials in order to login and access this package. These credentials will be provided to you either by the original sender or by another email notification.

If site policy requires it, at sign on you will be guided through additional steps to secure your account.

Please use the following URL and your username/password to login and view this package. You will also be given the opportunity to compose a secure reply to this package.

(<https://moveit.tdameritrade.com/human.aspx?OrgID=7077&Arg12=message&Arg06=876969857&Arg08=d20x3can1p0p47rl>)

Regards,
TD Ameritrade Ad-Hoc File Transfer Notification Service

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